

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MICHAEL ALLEN SCOTT,

Plaintiff,

v.

DOLLAR GENERAL CORPORATION,
and DOLGENCORP, Inc.,

Defendant.

C.A. No. 04-1395-SLR

JURY TRIAL DEMANDED

**DEFENDANTS' SUPPLEMENTAL ANSWER
TO PLAINTIFF'S FIRST INTERROGATORIES**

9. Identify the names, addresses, and phone numbers of all of the employees who worked at defendant's store in Capital Green through the years 2002, 2003, and 2004. With respect to each, state the time period when they were so employed and their race.

ANSWER:

Defendant objects to this interrogatory on the basis that it is unduly burdensome, overly broad, and not reasonably calculated to lead to evidence that is relevant to the claim or defense of any party. Without waiving the foregoing, below is a list of the employees who worked at store 384 during Plaintiff's employment in that store. This list also includes each employee's last known address.

THIS INFORMATION IS CONFIDENTIAL. IN ACCORDANCE WITH LOCAL RULE 26.2, DISCLOSURE IS LIMITED TO THE MEMBERS AND EMPLOYEES OF THE FIRM OF PLAINTIFF'S TRIAL COUNSEL UNLESS AND UNTIL A PROTECTIVE ORDER SPECIFYING DIFFERENT CRITERIA IS ENTERED BY THE COURT.

Jamie Cassidy
5418 Littlemasters Corner Road
Felton, Delaware 19943

Renee Chandler
110 Hanley Street
Harrington, Delaware 19952

Tracy Channell
160 D Willis Road
Dover, Delaware 19901

Annie Clark
146 Roosevelt Avenue
Dover, Delaware 19901

Angelita Davis
Willis Road
Dover, Delaware 19901

Diana Drobotan
3279 Hourglass Road
Hartly, Delaware 19953

Deanna Hoff
84 Briar Lane
Millsborough, Delaware 19966

Barry McElwee
235 Fulton
P. O. Box 82
Cheswold, Delaware 19736

Raymond Olsen
301 North State Street
Dover, Delaware 19901

Tanya Pratt
323 Northway Drive
Dover, Delaware 19901

Antonio Riddick
462 Sussex Avenue
Dover, Delaware 19901

Kelly Seward
48 Lone Star MHP
Camden, Delaware 19934

Roxanna Sweeney
(no address available)

Robert Williams
433 Collins Drive
Dover, Delaware 19901

Kelly Young
78 Prairie Dog Lane
Lot 4
Camden, Delaware 19934

YOUNG CONWAY STARGATT & TAYLOR LLP

/s/ Adria B. Martinelli

Adria B. Martinelli, Esquire (DE Bar I.D. 4056)
The Brandywine Building, 17th Floor
1000 West Street, P.O. Box 391
Wilmington, Delaware 19899-0391
Telephone: (302) 571-6613
Facsimile: (302) 576-3314
Email: amartinelli@ycst.com

OF COUNSEL:

Anderson Scott, Esquire (Georgia Bar I.D. 631940)
Fisher & Phillips LLP
945 East Paces Ferry Road, Suite 1500
Atlanta, GA 30327
Telephone: (404) 240-4289
Facsimile: (404) 240-4249
Attorneys for Dollar General Corporation
and Dolgencorp, Inc.

DATED: June 24, 2005

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

MICHAEL ALLEN SCOTT,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 04-1395-SLR
)	
DOLLAR GENERAL CORPORATION,)	JURY TRIAL DEMANDED
and DOLGENCORP, Inc.,)	
Defendant.)	

NOTICE OF SERVICE

I, Adria B. Martinelli, Esquire, hereby certify that on June 20, 2005, a true and correct copy of **Defendants' Supplemental Answer to Plaintiff's First Interrogatories** were served by depositing same in the United States Mail, postage prepaid, and that I electronically filed a true and correct copy of this Notice of Service with the Clerk of the Court using CM/ECF, which will send notification that such filing is available for viewing and downloading to the following counsel of record to the following counsel of record.

John S. Grady, Esquire
Grady and Hampton, LLC
6 North Bradford Street
Dover, DE 19904

YOUNG CONWAY STARGATT & TAYLOR LLP

/s/ Adria B. Martinelli

Adria B. Martinelli, Esquire (DE Bar I.D. 4056)
The Brandywine Building, 17th Floor
1000 West Street, P.O. Box 391
Wilmington, Delaware 19899-0391
Telephone: (302) 571-6613
Facsimile: (302) 576-3314
Email: amartinelli@ycst.com

OF COUNSEL:

Anderson Scott, Esquire (Georgia Bar I.D. 631940)
Fisher & Phillips LLP
945 East Paces Ferry Road, Suite 1500
Atlanta, GA 30327
Telephone: (404) 240-4289
Facsimile: (404) 240-4249
Attorneys for Dollar General Corporation
and Dolgencorp, Inc.